

GOVERNMENT OF THE DISTRICT OF COLUMBIA



May 15, 2008

Lora Siegmann Werner, MPH  
Senior Regional Representative  
Agency for Toxic Substances and Disease Registry, Region 3  
Department of Health and Human Services  
1650 Arch Street, 3HS00  
Philadelphia, PA 19103

Re: ATSDR Health Consultation, Indoor and Outdoor Air Evaluation for Chillum Perc Site, Chillum, Prince Georges County, Maryland, MDN000305887

Dear Ms. Werner:

Thank you for inviting comment from the District of Columbia on the above-captioned document, and for granting the District an additional week to submit its comment.

The District is particularly concerned about the health threats posed to District residents from indoor air potentially impacted by contaminants emanating from the Chillum Perc [loroethylene] Site ("Site"). To that end, the District has participated fully in the response activities being implemented by the U.S. Environmental Protection Agency's Region 3 Office ("EPA") regarding the Site. We are appreciative that EPA incorporated several of the District's recommendations in its May 8, 2008 Decision Document. The District is also keenly interested in working with ATSDR, and would be pleased to discuss its comments as ATSDR continues to evaluate the health of District residents.<sup>1</sup>

While it is apparent that ATSDR devoted considerable time and effort to the Chillum Consultation, our review of past ATSDR health assessments for similar sites with similar

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<sup>1</sup> As an initial matter, we note that in its evaluation of the Chillum Site, unlike the approach it takes at most sites, ATSDR did not seemingly consult the District's risk assessment or risk management strategies. In particular, we would ask that ATSDR consider the District's Risk-Based Corrective Action regulations and guidelines. These can be found at: <http://ddoe.dc.gov/ddoe/cwp/view,a,1209,q,495379.asp>; <http://ddoe.dc.gov/ddoe/cwp/view,a,1209,q,495386.asp>.

contaminants suggests that ATSDR did not employ the same scientific and technical methodology in its Chillum Consultation that it has at the other sites. Based on our comparison of the Chillum Consultation with the approaches and results used in past ATSDR investigations, we believe ATSDR potentially underestimated cancer risks and non-cancer health threats at the Chillum site for the following reasons:

- Health threats for numerous chemicals of concern (“COCs”) known to be associated with gasoline mixtures and Perc breakdown products were not considered;<sup>2</sup>
- It was not clear that the conventional ATSDR approach used to evaluate cumulative health effects associated with exposure to multiple COCs (that either target the same organ system or produce cancer) was followed; and
- The most recent ATSDR Cancer Risk Evaluation Guideline (“CREG”) level for benzene was apparently not used.

Additionally, unlike other sites ATSDR has investigated, the Chillum Site may be unique in that the majority of the residents are elderly, and some are infirm. Furthermore, according to our preliminary survey information, some residents may be suffering from existing medical conditions that may predispose them to the toxic effects of the vapors entering their homes. Although many of the toxicity values that ATSDR used to compare to site-specific data have incorporated safety factors, no (ATSDR- or USEPA-derived) toxicity value has ever been based on epidemiological or animal studies where the subjects have been very old or had a preexisting medical condition. To our knowledge, ATSDR did not conduct any health surveys or collect any medical information from the residents to determine if the toxicity factors are applicable and appropriate, or whether the toxicity values should be adjusted for the unique and highly sensitive population of Chillum residents.

We believe that if ATSDR revisits and revises its Chillum consultation to match what it has done at other similar sites, and if it considers the unique characteristics of the Chillum community, it will conclude that contaminant levels in some homes could pose a health threat.

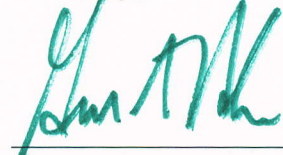
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<sup>2</sup> The District acknowledges that its own 2006 study done by Building Sciences & Engineering Associates (“BSEA”), which was an air study, and studies done by EPA and Chevron, Inc. (“Chevron”), also focused only on a pre-determined subset of contaminants. However, a comprehensive health assessment demands consideration of all the contaminants in a dataset. As ATSDR traditionally employs such comprehensive approach, we are uncertain why it did not do so with regard to Chillum, and are concerned that a narrow focus may have underestimated Site risk. We believe, nevertheless, that even if ATSDR’s focus remains limited to a subset of contaminants, if it evaluates those in the same manner it has done elsewhere in the country, ATSDR will conclude that the contaminant levels in some District homes could pose a health threat.

If you would like to discuss these or the attached specific comments, please contact Dr. V. Sreenivas, 202-478-9175, at the Department of Health, and Nick Kauffman, 202-535-2288, at the District Department of the Environment.

Thank you.

Sincerely,



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George S. Hawkins  
Director  
District Department of the Environment  
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Washington, DC 20002



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Pierre Vigilance, MD, MPH  
Acting Director  
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825 North Capitol Street, N.E., 4<sup>th</sup> Floor  
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Attachment